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BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268–0001

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

UNITED STATES POSTAL SERVICE MOTION FOR LATE ACCEPTANCE OF RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS JOHN P. KELLEY (USPS-T-15) TO INTERROGATORY OF THE MAGAZINE PUBLISHERS OF AMERICA, INC., REDIRECTED FROM WITNESS RACHEL TANG (USPS-T-35) (MPA/USPS-T35-21(b)-(c)) (August 4, 2006)

The United States Postal Service hereby moves for late acceptance of the response of witness John P. Kelley (USPS-T-15) to the following interrogatory of the Magazine Publishers of America, Inc., filed on July 18, 2006, and redirected from witness Rachel Tang (USPS-T-35):

MPA/USPS-T35-21(b)-(c)

A response to this interrogatory was due on August 1, 2006. This response is three days late because witness Kelley was only recently assigned to answer subparts (b) and (c) of this interrogatory. The Postal Service regrets this delay, but believes that no party has been prejudiced by it.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Brian M. Reimer		

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–3037; Fax –5402

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

Brian M. Reimer

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268-3037, FAX: -5402 August 4, 2006 Brian.M.Reimer@usps.gov